

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

**DECLARATION OF MARK MOORE**

I, Mark Moore, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury that the following is true and correct based on my personal knowledge and review of the relevant records. I am over 18 years old and, if called, I could and would testify to the information provided herein.

1. I am an FDEM employee and a recreational pilot living near the Dade-Collier Training and Transition Airport (TNT). Before TNT was used as a detention facility, I flew between 40-50 flights in and out of TNT. In addition, given that I live in the area and am part of the local aviation community, I am deeply familiar with the airport and its typical operation.

2. TNT has long been a popular airport for aviation students seeking to log flight hours and hone their aviation skills. Given its popularity, the airport would routinely host over 150 aviation operations each day. These operations typically included takeoffs, approaches, and landings that occurred in short succession without the aircraft coming to a complete stop. Such operations are colloquially known as “touch and gos.”

3. Much of the time I was at the airport, anywhere from two to three aircraft at a time would be in the traffic pattern running touch and gos. These aircraft varied in size, from smaller single-engine planes to larger multi-engine jets.

4. Along with touch and gos, TNT saw several arrivals and departures each day. It also served as a landing area for planes forced to divert because of a storm.

5. Like most airports, TNT was loud well before the detention facility was built. But several factors exacerbated the noise pollution caused by planes flying in and out of TNT. First, because aircraft were practicing takeoffs and landings, they typically flew at lower altitudes that are closer to humans and animals. Second, unlike most airports, TNT does not require that pilots follow noise-abatement procedures. A noise-abatement procedure is a measure designed to mitigate the noise from approaching airplanes. For example, airports will often require airplanes to follow a designated approach corridor that avoids residential areas, which limits the impact that the airplane's noise will have on the surrounding environment. TNT, by contrast, imposed no noise-abatement procedures. As a result, pilots could approach the airport from any number of locations, meaning that aircraft noise would often extend to areas all around the airport.

Executed on August 11, 2025, in Ochopee, Florida.

**Mark Moore** Digitally signed by Mark Moore  
Date: 2025.08.11 17:28:16 -04'00'  
\_\_\_\_\_  
Mark Moore